

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff / Counterclaim Defendant,

v.

ALAN DERSHOWITZ,

Defendant / Counterclaim Plaintiff

Case No. 19-cv-03377-LAP

**ALAN DERSHOWITZ'S FIRST SET OF REQUESTS FOR ADMISSION  
TO VIRGINIA L. GIUFFRE**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant and Counterclaim Plaintiff Alan Dershowitz hereby propounds his First Set of Requests for Admission to Plaintiff Virginia L. Giuffre ("Plaintiff" or "You"). Plaintiff shall respond to these Requests for Admission in writing and serve a copy of such answers upon Christian G. Kiely, at Todd & Weld LLP, One Federal Street, 27<sup>th</sup> Floor, Boston, MA 02110 within thirty (30) days of service hereof.

**Definitions**

1. "You" refers to Virginia L. Giuffre (née Roberts).
2. "Carolyn" refers to the individual with the first name Carolyn who was called as a witness in *United States v. Maxwell*, 20-cr-330-AJN (S.D.N.Y.) on December 7, 2021.

**REQUESTS FOR ADMISSION**

3. Please admit that You introduced Carolyn to Jeffrey Epstein when she was 14 or 15 years old.
4. Please admit that at the time You introduced Carolyn to Jeffrey Epstein, you were at least 18 years old.
5. Please admit that Carolyn was called as a witness in *United States v. Maxwell*, 20-cr-330-AJN (S.D.N.Y.) on December 7, 2021.
6. Please admit that you told Carolyn that she could be paid \$300 to give a massage to a rich man in Palm Beach.
7. Please admit that you told Carolyn to dress provocatively for her meeting with Jeffrey Epstein.
8. Please admit that you told Carolyn that if Jeffrey Epstein asked her age, she should tell him she was 17 years old.
9. Please admit that the first time Carolyn accompanied you to Jeffrey Epstein's house in Palm Beach, you had sex with Mr. Epstein in front of Carolyn.
10. Please admit that you solicited Carolyn to accompany you to Jeffrey Epstein's house in Palm Beach by telling her she would be paid \$300.
11. Please admit that Jeffrey Epstein paid you to introduce Carolyn to him.
12. Please admit that Jeffrey Epstein paid you to solicit Carolyn.

ALAN DERSHOWITZ,

By his attorneys,

/s/ Howard M. Cooper

Howard M. Cooper (MA BBO# 543842)

(*pro hac vice*)

Christian G. Kiely (MA BBO# 684308)

(*pro hac vice*)

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Dated: December 10, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2021, a copy of the foregoing was sent via email to Plaintiff's counsel of record listed as registered participants on the Notice of Electronic Filing.

/s/ Christian G. Kiely

Christian G. Kiely